

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

Plaintiff,

v.

ADVENT INTERNATIONAL
CORPORATION,

Defendant,

and

ADVENT INTERNATIONAL
CORPORATION,

Counterclaim-Plaintiff,

v.

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

Counterclaim-Defendant.

Civil Action No. 23-cv-10684-IT

**DEFENDANT AND COUNTERCLAIM-PLAINTIFF ADVENT INTERNATIONAL
CORPORATION’S MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF ITS
MOTION TO COMPEL**

Pursuant to Local Rule 7.1(b)(3), Defendant and Counterclaim-Plaintiff Advent International Corporation (“AIC”) respectfully requests leave to file a reply (the “Reply”), attached hereto as Exhibit A, in support of its Motion to Compel. In support of this motion, AIC states as follows:

1. On August 23, 2023, AIC filed its Motion to Compel and a Memorandum of Law in support thereof (the “Motion”) (Dkt. Nos. 74-75).

2. On September 6, 2023, with AIC's consent, SF filed a request to extend its deadline to file an opposition to the Motion by five days until September 11, 2023 (the "Extension Request") (Dkt. No. 84).
3. On September 7, 2023, the Court granted the Extension Request (Dkt. No. 89).
4. On September 11, 2023, SF submitted its opposition to the Motion (the "Opposition") (Dkt. No. 99).
5. On September 14, 2023, the Motion was referred to Magistrate Judge Jennifer C. Boal for resolution (Dkt. No. 100).
6. The Opposition makes several factual and legal assertions that warrant response, including that: (1) SF's supplemental response to Interrogatory No. 4 satisfied SF's obligations with regards to that Interrogatory; and (2) AIC's purported ability to independently obtain the Criminal Investigative File at issue in the Motion by having its affiliates submit to arrest in Mexican proceedings whose legitimacy AIC vigorously contests means that SF does not need to produce that information. AIC could not have reasonably addressed these arguments in its Motion, and allowing AIC to address these two issues on Reply will materially assist the Court in resolving the Motion. *See Noonan v. Wonderland Greyhound Park Realty LLC*, 723 F. Supp. 2d 298, 349 (D. Mass. 2010).
7. AIC has conferred with Servicios Funerarios, which indicated that it opposes AIC's request for leave to file the Reply because AIC would not consent to SF filing a sur-reply.

WHEREFORE, AIC respectfully requests that this Court allow AIC's motion for leave to file the Reply.

Dated: September 29, 2023

/s/ Andrew J. Rossman

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2023, I served a copy of the foregoing document via ECF to all counsel of record.

/s/ Andrew J. Rossman

Andrew J. Rossman
*Counsel for Defendant and
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